



PO Box 150
Massena, NY 13662

September 4, 2018

Mr. Murray Lantner, P.E.
Compliance Section, Water Compliance Branch
U.S. Environmental Protection Agency, Region 2
290 Broadway, 20th Floor
New York, NY 10007

Re: Arconic – Massena Operations
SPDES Discharge Permit NY001732
Response to EPA Comments Dated June 26, 2018

Dear Mr. Lantner:

Provided below are Arconic's responses to your comments provided on June 26, 2016 via e-mail.

Comment 1

How is potassium permanganate feed controlled? Seems like it needs a flow-based feed given the heterogenous flow patterns?

Arconic Response

Potassium permanganate feed is controlled by an LMI injection pump. This pump is paced by the influent and return flows within the system with setpoints within the programmable logic.

Comment 2

What is the status of the Cleaning of the Area III Impoundment?

Arconic Response

The Area III Impoundment cleaning project has begun with an anticipated completion date of September 7, 2018. Sediment dewatering and solidification, as needed, will be complete prior to November 1, 2018.

Comment 3

What is the status of 01I?

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Arconic Response

OII has been removed from the final SPDES permit effective June 1, 2018.

Comment 4

Arconic must begin sampling outfall 01A for fecal coliform when it discharges sanitary wastewaters. Also consult with NYSDEC to discuss MWP modification to require this monitoring when sanitary wastewaters are sent to 01A and to determine if this change in flow from 01D to 01A can be authorized.

Arconic Response

Arconic and the New York State Department of Environmental Conservation (NYSDEC) have revised the Arconic Massena Operations Miscellaneous Wastewater Plan to require the sampling of Fecal Coliform in the event of an overflow of the sanitary equalization tank to Outfall 01A.

Comment 5

What is Status of SWPPP and NOI?

Arconic Response

In accordance with the Arconic Massena Operation SPDES permit, Arconic has revised the Best Management Practices (BMP's) to include language regarding Storm Water Pollution Prevention Plan (SWPPP) requirements. An Notice of Intent (NOI) has been filed for a specific project (PPA Cover Project) on-site which meets the requirements. A project specific SWPPP has been created and is active.

Comment 6

How often are the Outfall 001 booms inspected and replaced?

Arconic Response

The booms at Outfall 001 are changed seasonally up to 4 times per year and inspected monthly.

Comment 7

It appears that the chart should be changed to account for the submergence.

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Arconic Response

Arconic Massena Operations is currently evaluating the most appropriate flow measurement device and calculations for the outfall.

Comment 8

What is the status of closed loop chiller and schedule for implementation?

Arconic Response

The closed loop chiller project has been added to the 2019 Capital Project list. The preliminary engineering will be complete in 2018 with construction to be completed in Q1 2019.

Comment 9

Discuss with DEC on whether a flume with accuracy throughout the range of expected flows is needed.

Arconic Response

Arconic Massena Operations and the NYSDEC believe that the accuracy of the flume is adequate.

Comment 10

Area II Impoundment Pump schedule for repair?

Arconic Response

The Area III Impoundment Pump has been repaired and installed.

Comment 11

Is sample being collected directly into the sample bottle or is it transferred?

Arconic Response

The sample is collected directly in to the jar.

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Comment 12

What is the status of the smelter courtyard sweepings and slide seal repair.

Arconic Response

The smelter courtyards have been cleaned. An engineering study has been completed on air slide improvements and/or replacement, capital improvements are expected in Q4 2018.

Comment 13

Are phenol samples being analyzed in accordance with the approved method?

Arconic Response

Phenol samples are being analyzed in accordance with the Massena Operation SPDES permit and approved methods.

Comment 14

Has DMR been updated to include this monitoring?

Arconic Response

Arconic continues to work with the NYSDEC to ensure the electronic DMR includes all necessary reporting. In a case where electronic input is unavailable, Arconic Massena Operations attaches/appends data summaries and lab data electronically in the Net DMR system.

Comment 15

DMR should distinguish between these two reported parameters.

Arconic Response

Arconic continues to work with the NYSDEC to ensure the electronic DMR includes all necessary reporting. In a case where electronic input is unavailable, Arconic Massena Operations attaches/appends data summaries and lab data electronically in the Net DMR system.

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Please contact me at 315-212-9069 or Todd.Furnia@Arconic.com with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd J. Furnia". The signature is fluid and cursive, with the first name "Todd" being more prominent.

Todd J. Furnia
Environmental and Security Manager

Cc: Env. File Copy – Arconic
T. Long – Arconic
D. Rarick – NYSDEC – Region 6